

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In Re:) 19-02335
)
STACY BERTRAND,) Chapter 13
)
Debtor.) Hon. Judge: DOYLE

NOTICE OF MOTION

To the following persons or entities who were served via email by the Bankruptcy Court
U.S. Bankruptcy Trustee: USTPRegion11.ES.ECF@usdoj.gov
Tom Vaughn, Chapter 13 Trustee: ecf@tvch13.net

To the following persons or entities who were served via first-class U.S. Mail:
See attached service list.

Please take notice that I shall appear before the following named Bankruptcy Judge, or any other Judge presiding in his or her stead at 219 S. Dearborn Street, Chicago, IL 60604, and in the following courtroom (or any other place posted), and present the attached **Motion to Extend Time to File a Claim**, at which time and place you may appear.

JUDGE: DOYLE
ROOM: 742
DATE: March 3, 2020
TIME: 9:30 AM

PROOF OF SERVICE

The undersigned certifies that copies of this Notice and attachments were served to the listed persons or entities, if service by mail was indicated above, by depositing same in the U.S. Mail at Wheeling, Illinois 60090, on or before February 6, 2020, at 5:30 p.m., with proper postage prepaid, unless a copy was provided electronically by the Bankruptcy Court.

DATE OF SERVICE: February 6, 2020

/s/ Robert C. Bansfield Jr.
Robert C. Bansfield Jr. ARDC #6329415

Attorney for the Debtor(s)
DAVID M. SIEGEL & ASSOCIATES
790 Chaddick Drive
Wheeling, IL 60090
847/520-8100

To the following persons or entities who have been served via U.S. Mail:

Stacy Bertrand
1501 S. Wolf Road #451
Prospect Heights, IL 60070

The Illinois Tollway
PO Box 5544
Chicago, IL 60680

The Illinois Tollway
2700 Ogden Ave.
Downers Grove, IL 60515

CEP America Illinois LLP
Wakefield and Associates
Po Box 50250
Knoxville, TN 37950-0250

LVNV Funding, LLC
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

Illinois Lending Corp
701 Lee St.
Suite 570
Des Plaines, IL 60016

Santander Consumer USA Inc.
P.O. Box 961245
Fort Worth, TX 76161

IRS
Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

Capital One Bank (USA), N.A.
4515 N Santa Fe Ave
Oklahoma City, OK 73118

Commonwealth Edison Company
Bankruptcy Department
1919 Swift Drive
Oak Brook, IL 60523

Capital One, N.A.
c/o Becket and Lee LLP
PO Box 3001
Malvern PA 19355-0701

Illinois Department of Revenue Bankruptcy
Section
PO Box 19035
Springfield, IL 62794-9035

U.S. Department of Education
c/o FedLoan Servicing
P.O. Box 69184
Harrisburg, PA 17106-9184

**UNITED STATES BANKRUPTCY COURT
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EASTERN DIVISION**

In Re:)	19-02335
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STACY BERTRAND,)	Chapter 13
)	
Debtor.)	Hon. Judge: DOYLE

**MOTION TO EXTEND TIME FOR DEBTOR TO FILE A CLAIM ON BEHALF OF
CREDITOR**

NOW COMES, the Debtor, STACY BERTRAND, by and through her attorneys, DAVID M. SIEGEL AND ASSOCIATES, to present this Motion, and in support thereof states as follows:

1. Jurisdiction is proper and venue is fixed in this Court with respect to these parties.
2. On January 28, 2019, the Debtor filed a voluntary petition for relief pursuant to Chapter 13 under Title 11 USC, and the Chapter 13 plan was confirmed on June 4, 2019. Tom Vaughn was appointed Trustee in this case.
3. The Debtor's confirmed Chapter 13 plan provides for payments of \$350.00 for at least 36 months, with payments to the General Unsecured Creditors of not less than 10% of their allowed claims. The plan was subsequently modified for the Debtor to pay \$400.00 for the remainder of her plan.
4. The Debtor tried in good faith to list all of her creditors in the schedules filed with the Chapter 13 petition, but a debt owed to The Illinois Tollway was inadvertently omitted.
5. The deadline for filing a proof of claim was April 8, 2019, for all creditors except governmental units, and July 29, 2019, for governmental units. The time for the Debtor to file a proof of claim pursuant to Bankruptcy Rule 3004 has expired.
6. The Debtor owes The Illinois Tollway \$1,145.60, as unsecured.

7. The Debtor intends that the debt owed to The Illinois Tollway be paid through her Chapter 13 plan, and desires to file a claim on behalf of said creditor to provide for that payment.
8. The Debtor further seeks that payment under the claim for said creditor be allowed and the time to file claims to be extended.
9. Payment of the debt owed to said creditor will not render the Debtor's Chapter 13 plan unfeasible, and will not unfairly impair the rights of the other creditors of the Debtor.
10. The plan will complete within 60 months if the Debtor's motion is granted and unsecured creditors will still receive no less than 10% of their allowed claims.

WHEREFORE, the Debtor, STACY BERTRAND, prays that this Honorable Court enter an Order to Extend Time for Debtor to File a Claim on Behalf of Creditor, and for other such relief as the Court deems fair and proper.

Respectfully Submitted,

/s/ Robert C. Bansfield Jr.

Robert C. Bansfield Jr. ARDC #6329415
Attorney for the Debtor(s)

DAVID M. SIEGEL & ASSOCIATES
790 Chaddick Drive
Wheeling, IL 60090
847/ 520-8100